REMARKS

In view of the above amendments and the following remarks, reconsideration and further examination are requested.

Various editorial amendments have been made to the specification. No new matter has been added. A substitute specification and abstract along with a marked-up copy of the substitute specification and abstract are filed herewith.

In item 1 on page 2 of the Office Action, the Examiner indicates that the Japanese Patent 3408786 listed as reference AK on the form 1449 of March 13, 2006 has not been considered. The Examiner has mistakenly indicated that the reference is not in the file. The reference is in fact in the file, but as the front page of the reference, the Applicant has supplied the English abstract, which may be issued prior to patenting and thus is listed by the Publication number 2002-083226. Please see item 21 which indicates the Application no. 2000-269250, which is of course the same for both the English abstract of the publication 2002-083226 and the patent 3408786. Therefore, it is requested that the Examiner return an initialed copy of the form 1449 indicating that all references have been considered in view of the fact that the copy of the 3408786 Japanese patent has been supplied as required along with an English language Abstract thereof as issued in connection with the Japanese application/publication.

By this amendment, claims 1-3, 5, 6, and 8-12 have been amended. Claims 1-12 remain pending.

The claims have been amended to address the claim objections set forth in item 2 of the Office Action. With respect to Claim 8, the language has been changed to clarify that each of the first and second access control units possesses the recited functions, so as to avoid the construction that each unit performs the function at the same time.

In item 3 of the Office Action, claims 1, 3, and 8-12 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Yahiro (US 2002/0037745) in view of Yamagami (US 7,240,197). This rejection is traversed and is inapplicable to claims 1, 3, and 8-12 as amended for the following reasons.

Claim 1 as amended includes a recitation directed to "a space unification unit for forming a virtual unified memory space by unifying a logical address of the first rewritable nonvolatile memory and a logical address of the second rewritable nonvolatile memory." As shown in paragraph [0093](Step S314) and Fig. 10B (S314), of the present application, it is possible to form a virtual unified memory space by unifying, for example, a logical address of a RAM in a memory card and a logical address of a memory of a storage server. Thus the present invention is able to obtain the virtual unified memory space as a memory space of a memory card (as a FAT).

With the cited invention of Yahiro, it is unnecessary for the user to remember which data item is stored in the peripheral apparatus or where the data item is stored in the apparatus. However, Yahiro fails to disclose or suggest "forming a virtual unified memory space by unifying a logical address of the first rewritable nonvolatile memory and a logical address of the second rewritable nonvolatile memory" as recited in claim 1.

With the present invention, it is possible to write data of a file even if the size of the file to be written is unknown. On the other hand, the invention of Yahiro needs to determine the size of the file to be written before writing data of the file because the invention of Yahiro only checks whether apparatuses have a vacant area large enough to store data (see Fig. 4 in Yahiro). Therefore, with the invention of Yahiro, it is impossible to perform a processing that makes a recording apparatus such as a digital video camera and a recorder (e.g. DVD recorder, HDD recorder) continue to record data as long as free space for recording exits, and that makes those apparatuses stop recording data at the time when no more free space for recording exits.

As described in Paragraph [0146], the present invention achieves a system that may include a plurality of storage servers, so the number of storage servers and FAT to be managed by the system is not limited to one. As a result, for example, the present invention can achieve an SD card that has the capability of a plurality of SD cards, that is, as if the SD card has a built-in disc changer, in a case where preparing a network address corresponding to, for example, a 4Gbyte-memory space of each of a plurality of storage servers, unifying each memory space, and switching the address space based on the network address.

The secondary reference, Yamagami does not provide the disclosure that is missing from

Yahiro of "forming a virtual unified memory space by unifying a logical address of the first rewritable nonvolatile memory and a logical address of the second rewritable nonvolatile memory" as recited in claim 1, nor was Yamagami relied on for such a disclosure. Accordingly, no obvious combination of Yahiro and Yamagami would result in the invention recited in claim 1. Therefore, claims 1-10 would not have been obvious to a person having ordinary skill in the art in view of Yahiro and Yamagami under 35 U.S.C. § 103(a).

Independent claims 11 and 12 also include recitations including the language "forming a virtual unified memory space by unifying a logical address of the first nonvolatile memory and a logical address of the second nonvolatile memory." Therefore, claims 11 and 12 would also not have been obvious to a person having ordinary skill in the art in view of Yahiro and Yamagami under 35 U.S.C. § 103(a) for the same reasons set forth above.

Dependent claim 2 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Yahiro in view of Yamagami and Pong (US 6,728,843), and dependent claims 4-7 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Yahiro in view of Yamagami and Kirkland (7,395,339). These rejections are traversed. Neither Pong nor Kirkland provides the disclosure that is missing from Yahiro and Yamagami of "forming a virtual unified memory space by unifying a logical address of the first rewritable nonvolatile memory and a logical address of the second rewritable nonvolatile memory" as recited in claim 1, upon which claims 2, and 4-7 ultimately depend, nor were Pong and Kirkland relied on for such a disclosure. Accordingly, no obvious combination of Yahiro and Yamagami with Pong or Kirkland would result in the inventions recited in claim 1, 2, or 4-7. Therefore, claims 1, 2, and 4-7 would not have been obvious to a person having ordinary skill in the art in view of any combination of Yahiro, Yamagami, and Pong or Kirkland under 35 U.S.C. § 103(a).

In view of the above amendments and remarks, it is submitted that claims 1-12 are allowable over the prior art of record and that the present application is in condition for allowance. The Examiner is invited to contact the undersigned by telephone to resolve any remaining issues.

Respectfully submitted,

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